



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

September 10, 2014

URS Corporation
Attn: Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

RE: ER# 2014-1767-042-A
FERC: Cultural Resources Scoping
Document for the Proposed PennEast
Pipeline Project, Bucks, Carbon, Luzerne
& Northampton Counties

Dear Mr. Wyatt:

The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. Our comments are as follows:

Thank you for providing this proposed plan to identify both above-ground and below-ground cultural resources which may be affected by the proposed PennEast Pipeline Project. We concur with the proposed methodology for field survey to identify these resources. We also concur with the proposed Unanticipated Discovery Plan for this project.

We look forward to reviewing the results of the cultural resources investigations to be carried out for this project. If you have any questions or comments concerning our review for above-ground resources, please contact Barbara Frederick at (717) 772-0921. If you have any questions or comments concerning our review for below-ground resources, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection





October 25, 2014

Mr. Douglas McLearn, Chief
 Division of Archaeology and Protection
 Pennsylvania Historical and Museum Commission
 Bureau for Historic Preservation
 Commonwealth Keystone Building, 2nd Floor
 400 North Street
 Harrisburg, PA 17120-0093

**Re: ER# 2014-1767-042
 Updated PennEast Pipeline Alignment
 PennEast Pipeline Company, LLC - PennEast Pipeline Project
 Luzerne, Carbon, Northampton, and Buck Counties, Pennsylvania.**

Dear Mr. McLearn:

On behalf of the PennEast Pipeline Company, LLC (PennEast), URS is notifying the Pennsylvania Historical and Museum Commission’s (PHMC) of the most recent route of the proposed PennEast Pipeline Project. The current preferred alternative has been shifted three to four miles northeast between Mileposts 11.0 and 35.0 in Luzerne and Carbon Counties (Attachment 1). Our methodology for identifying archaeological sites and above-ground cultural resources approved by the PHMC in a letter dated September 10, 2014 has not changed. Using data from the Cultural Resources Geographic Information System, Table 1 lists previously recorded archaeological sites within the 400-foot study corridor centered on the new preferred alternative route and Table 2 lists previously recorded above-ground cultural resources within the 400-foot study corridor centered on the new preferred alternative route.

A total of eight archaeological sites and 17 above-ground resources are mapped within the respective study corridors.

Table 1: Previously Recorded Archaeological Sites within the Study Corridor

Site ID	Type	Temporal Component	Setting	NRHP Status	Milepost
36LU0111	Surface Scatter	Prehistoric: No data	Stream Bench	No data	MP 22.4
36NM0157	Lithic Reduction	Prehistoric Woodland	Hillslope	Undetermined	MP 65.3
36NM0180	Domestic	Historic: 19 th c.	Hilltop	Undetermined	MP 66.3
36NM0291	Open Habitation	Prehistoric: Middle Archaic through Early Woodland	Floodplain	Undetermined	MP 68.0
36NM0075	Open Habitation	Prehistoric: No data	Hillslope	Undetermined	MP 68.4
36NM0076	Open Habitation	Prehistoric: Late and Terminal Archaic	Hillslope	Undetermined	MP 69.2
36BU0123	No data	Prehistoric: No data	Hilltop	Undetermined	MP 73.7
36BU0119	No data	Prehistoric: No data	Terrace	Undetermined	MP 74.4

Table 2: Previously Recorded Above-Ground Cultural Resources within the Study Corridor

BHP Key #	Resource Name	County	Milepost	NRHP Status and Date
156670	Hildebrandt Farmstead	Luzerne	0.1	Undetermined
156166	Delaware, Lackawanna, and Western RR	Luzerne	6.0	Undetermined
097158	Jeremiah Blanchard House	Luzerne	7.3	Undetermined
155754	Central Railroad of New Jersey	Luzerne	9.5	Undetermined
156109	Lehigh Valley Railroad	Luzerne	11.3	Undetermined
144291	Appalachian Trail	Carbon	50.4	Eligible: 4/11/2008
156534	Lehigh and New England Railroad	Northampton	51.5	Undetermined
156601	Pennsylvania - New Jersey (PNJ) Interconnection; Wallenpaupack to Siegfried Transmission Line	Northampton	54.1	Eligible: 8/29/2011
157176	Fehnel Farm	Northampton	54.6	Eligible: 2/11/2013
096314	Koch Farm	Northampton	66.0	Undetermined
096308	Redington Steel Works Proving Grounds	Northampton	68.0	Eligible: 1/31/1990
086688	Site No. 3: Farmhouse, Barn & Outbuildings	Northampton	68.7	Eligible: 3/11/1996
086674	Limekiln	Northampton	68.8	Undetermined
143013	Christman Farm; Pichel Farm	Northampton	69	Eligible: 8/21/2006
123914	Isaac Stout House	Northampton	71.6	NRHP Listed: 8/11/2004
098081	1215 County Line	Bucks	72.8	Undetermined
001661	Delaware Division of the Pennsylvania Canal	Bucks	74.5	NHL Listed: 12/8/1976

If you have any comments or questions regarding this submittal, please feel free to contact me at (717) 635-7942 or at andrew.wyatt@urs.com.

Sincerely,



URS Corporation

Andrew Wyatt, Senior Archaeologist
 4507 North Front Street, Suite 200
 Harrisburg, PA 17110



January 14, 2015

Mr. Douglas McLearen
Pennsylvania Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042, Updated PennEast Pipeline Alignment
PennEast Pipeline Company, LLC - PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Buck Counties, Pennsylvania.

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Texas Eastern Transmission, LP; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015.

Over the past months, PennEast has worked to refine a new preferred alternative route and to obtain permissions to survey. To that end, we must inform you that the preferred alternative route has been adjusted to account for engineering, environmental, and land use constraints that have been identified since we last provided your agency with detailed project mapping on October 24, 2014. In Pennsylvania, the preferred alternative route has been re-routed for approximately 2.5 miles to the north side of State Route 33 near Bethlehem, PA. USGS topographic maps showing just the new route adjustments in Pennsylvania and updated shapefiles for the entire new preferred alternative route are being provided to aide in your review and analysis of the project.

We look forward to working with you and your colleagues on this important project. Please contact me if you have any questions.

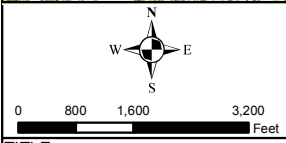
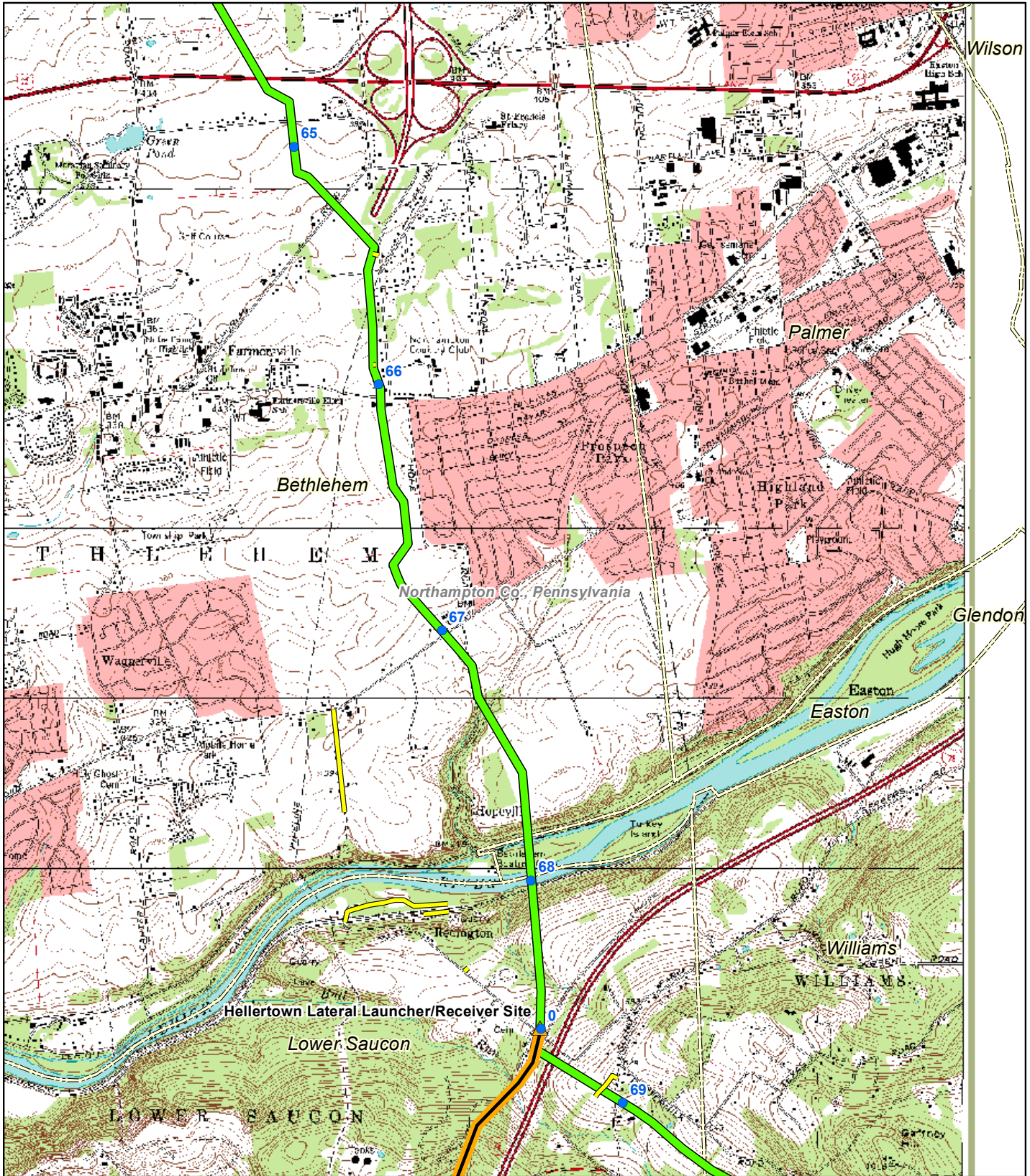
Sincerely,

Bernie Holcomb

Pipeline Environmental Services Manager

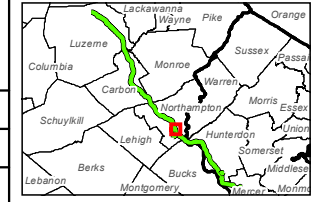


URS Corporation 625 West Ridge Pike, Suite E-100 ; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956 ; Fax: 610-832-3501 bernard.holcomb@urs.com



Legend		Reference:	
● Mile Postings Primary	— PennEast New Preferred Alternative Route	▲ Interconnect	— Access Road
		— Hellertown 24" Lateral	▭ Municipality Boundary
			▭ County Boundary

TITLE: PennEast Pipeline Project USGS Topographic Maps			
LOC: Nazareth Quadrangle		REV.:	
CKD. BY: BH	ENG.:	Date: 1/13/2015	W.O.:
DRN. BY: VP	SCALE: SEE GRAPHIC SCALE	DWG. NO.:	SHEET: 21 of 33



PennEast
PIPELINE

PennEast Pipeline Company, LLC



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

March 2, 2015

URS Corporation
Attn: Bernie Holcomb
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

RE: ER# 2014-1767-042-E
FERC: Updated PennEast Pipeline
Alignment, Bucks, Carbon, Luzerne &
Northampton Counties

Dear Mr. Holcomb:

The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. Our comments are as follows:

Above Ground Resources

In our opinion this project may have an effect on properties that may be eligible for the National Register of Historic Places (listed below). Furthermore, it is our opinion that this project may adversely affect the historic and architectural qualities that make the property eligible. To comply with the regulations of the Advisory Council on Historic Preservation, you must follow the procedures outlined in 36 CFR 800.6, when the effect is adverse. You will need to notify the Advisory Council of the effect finding and continue to consult with the Bureau for Historic Preservation to seek ways to avoid, minimize, or mitigate the effects on historic properties.

Limekiln – Key No. 086674

Below Ground Resources

Significant archaeological sites are located in or near your project area and others are likely to exist. These resources could be adversely affected by project activities. A Phase I archaeological survey to verify the extent of known sites and to locate other sites is needed to determine their eligibility for listing in the National Register of Historic Places. Guidelines and instructions for conducting Phase I surveys are available on our



Page Two
Mr. Holcomb
March 2, 2015

web site or from our office upon request. The recorded sites in the area are listed below.

P.A.S.S. # 36NM0140, 36NM0221, 36NM0294

If you have any questions or comments concerning above ground resources, please contact Emma Diehl at (717) 787-9121. If you have any questions or comments concerning below ground resources, please contact Mark Shaffer at (717) 783-9900.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection





March 31, 2015

Mr. Douglas McLearen
Pennsylvania Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Spectra Energy Partners; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. Over the past months, PennEast has worked to refine a preferred alternative route and to obtain permissions to survey. To that end, we must inform you that the preferred alternative route has again been adjusted to account for engineering, environmental, and land use constraints that have been identified since we last provided your agency with detailed project mapping on January 14, 2015.

Following feedback from FERC's scoping meetings and numerous conversations with landowners, state and local agencies, and other various stakeholders, PennEast has revised and refined various portions of the preferred alternative route. The largest variations to the previously released route are related to the location of the crossing of the Bethlehem Authority water supply mainline (MP 44 and MP 45), Appalachian Trail crossing (between MP 46 and MP 55), and accommodating future subdivision and housing development plans. Additional field data gained over the last month has helped make smaller adjustments related to environmental surveys and individual discussions with landowners.

In addition to the route variations noted above, an additional interconnect was needed for the Gilbert Power Generation facility in Holland Township, New Jersey, which is fed by a small lateral (12 inches) to supply natural gas to the facility. The previously located interconnection with Elizabethtown Gas was relocated so that both interconnects can be co-located within the power station's industrial property to minimize additional above-ground impacts.

A summary of the significant route variations in Pennsylvania is provided below:

- In Towamensing Township in Carbon County, PA, less than one mile of the alignment has been re-routed ¼-mile to the east as a result of consultations with the Bethlehem Authority (Authority). The alignment has been re-routed between mileposts 44 and 45 to cross the Authority's water supply mainline in a location where it is deeper in an effort to maximize protection of the Authority's resources.
- Straddling the Carbon – Northampton County line in PA, approximately 8 miles of the alignment between mileposts 46 and 55 has been re-routed up to 1 mile to the west of the previous route in an effort to refine the crossing location of the Appalachian Trail.

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- In Northampton County, PA, approximately 2.5 miles of the alignment has been re-routed less than ½-mile to the north of the previous route as a result of consultations with private landowners and local officials. The alignment has been re-routed between mileposts 59 and 62 to accommodate current and future land use plans in the area.

Updated USGS-based topographic maps for the entire new preferred alternative route are being provided to aide in your review and analysis of the project.

We look forward to continuing to work with you and your colleagues on this important project. Please contact me if you have any questions.

Sincerely,

Bernie Holcomb

Pipeline Environmental Services Manager



URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

22 April 2015

Mr. Bernie Holcomb
URS Corporation
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

RE: ER No. 2014-1767-042-I
FERC: Updated PennEast Pipeline Alignment
Bucks, Northampton, Carbon, & Luzerne
Counties

Dear Mr. Holcomb:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 *et seq.* (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Archaeological Resources

Significant archaeological sites are located in or near your project area and others are likely to exist. These resources could be adversely affected by project activities. A Phase I archaeological survey to verify the extent of known sites and to locate other sites is needed to determine their eligibility for listing in the National Register of Historic Places. Guidelines and instructions for conducting Phase I surveys are available on our web site or from our office upon request. The recorded sites in the area are listed below.

P.A.S.S. # 36BU0119 P.A.S.S. # 36BU0123 P.A.S.S. # 36NM0089

P.A.S.S. # 36NM0114 P.A.S.S. # 36NM0149 P.A.S.S. # 36NM0157

P.A.S.S. # 36NM0221

Historic Structures

An identification documentation submission of the project area is required to locate potentially significant above ground resources. Please see the "Survey Guidelines for Pipeline Projects – Above Ground Resources" for additional guidance located on our website:
http://www.portal.state.pa.us/portal/server.pt/community/project_review_under_section_106_and_pa_history_code/3787/guidelines/415082. For more information on survey strategies and methodologies, please contact the staff referenced below.

Based on a cursory review of our CRGIS on-line database and files, the following previously identified properties are located within the proposed project area:

Key No. 156670—Hildebrandt Farmstead (Undetermined)
Key No. 156166—Delaware, Lackawanna, & Western Railroad (Undetermined)
Key No. 001016—Lehigh Canal: Easton Section (National Register Listed)
Key No. 097158—Jeremiah Blanchard House (Undetermined)
Key No. 155754—Central Railroad of New Jersey (Undetermined)
Key No. 156109—Lehigh Valley Railroad (Undetermined)
Key No. 201072—Hickory Run Recreational Demonstration Area (National Register Eligible)
Key No. 144291—Appalachian Trail (National Register Eligible)
Key No. 156534—Lehigh & New England Railroad (Undetermined)
Key No. 156601—PNJ Interconnection: Wallenpaupack to Siegfried Transmission Line (National Register Eligible)
Key No. 157176—Fehnel Farm (National Register Eligible)
Key No. 096314—Koch Farm (National Register Eligible)
Key No. 086688—Site No. 3: Farmhouse, Barn, & Outbuildings (National Register Eligible)
Key No. 096315—Bayer Farm (National Register Eligible)
Key No. 096307—Anthony Oberly Farm (National Register Eligible)
Key No. 086674—Limekiln (Undetermined)
Key No. 143013—Christman Farm (National Register Eligible)
Key No. 123914—Isaac Stout House (National Register Listed)
Key No. 09081—1215 County Line (Undetermined)
Key No. 001661—Delaware Division of the Pennsylvania Canal (National Historic Landmark)

A preliminary review of this project indicates that there may be additional National Register-eligible historic buildings, structures, districts, or objects in the project area. Underground pipelines have the potential to affect these resources when compressor stations are proposed and/or the line requires clear cutting a new right-of-way or access roads through hedgerows, wooded area, other landscape features or placement of new features amongst clusters of buildings associated with a farm. A farm is defined as encompassing the farm dwelling(s), barn, outbuildings and the crop fields, meadows, pastures, orchards, woodlots, etc. and including landscape features such as fences, tree lines, contour strips, streams, etc. and circulation networks. Please use the PHMC-BHP Historic Agricultural Resources of Pennsylvania, c 1700-1960 context which is available here: http://www.portal.state.pa.us/portal/server.pt/community/pennsylvania%27s_agricultural_history/2584 to determine the identified agricultural region your project is located within and its registration requirements (farm, farmstead, or rural historic district).

Section 106 Consultation

As the project has the potential to affect National Register-eligible and listed resources, in accordance with the regulations for Section 106 (36 CFR 800.2.a.4), federal agencies, or those acting on their behalf, are required to consider the effects of their undertakings on historic properties in consultation with identified historic preservation stakeholders. Consultation is defined as the process of seeking, discussing and considering the views of other participants and, where feasible, seeking agreement with them regarding matters arising in the Section 106 process. Please provide documentation of your agency's efforts to identify consulting parties with an interest in the effect of this project on historic properties.

If you need further information regarding archaeological resources, please contact Mark Shaffer at (717) 783-9900. If you need further information concerning historic structures, please contact Emma Diehl at (717) 787-9121.

Sincerely,



Douglas C. McLearen, Chief
Division of Archaeology and Protection



July 27, 2015

Mr. Douglas McLearen
Pennsylvania Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042, Updated PennEast Pipeline Alignment
PennEast Pipeline Company, LLC - PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Buck Counties, Pennsylvania.

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Spectra Energy Partners; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. PennEast filed Draft Resource Reports with FERC in April 2015. Since the Preliminary Draft Resource Report filing in April 2015, PennEast has continued to evaluate potential alternatives to the proposed pipeline alignment based on comments received during the formal Scoping process, ongoing dialogue with federal, state, regional and local agencies, land owners, and the findings from field surveys and engineering analyses. In the April filing we provided an overview of the ongoing assessments for three major alternatives and over 70 minor route variations.

In the past three months the overall alignment has been adjusted within the 400 foot survey corridor to avoid and/or minimize impacts to wetlands and waterbodies, cultural resources, agricultural lands and other sensitive habitats. In Pennsylvania, two reroutes and more than 40 minor route variations have been evaluated. The two reroutes evaluate alternative ways of crossing the Appalachian Trail and nearby PA State Game Lands, and avoid active quarrying operations. These alternatives and reroutes have gone through the same detailed assessment as those assessed in the April filing. Updated USGS maps and GIS shapefiles for the entire new preferred alternative route are attached to aide in your review and analysis of the Project. (To open the shapefiles, please add a “.zip” extension to the file and then extract the files.)

Significant reroutes include:

- In Plains Township and Laflin Borough in Luzerne County, approximately 3.6 miles of the alignment has been rerouted one mile to the east to avoid active quarrying operations (new mileposts 8.4 to 12.3).
- In Towamensing Township and Lower Towamensing Township in Carbon County, approximately two miles of the alignment has been rerouted approximately two miles to the west. This reroute addresses a request for a new Interconnect as well as concerns related to the Appalachian Trail and PA State Game Lands (new mileposts 48.9 to 53.6).

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We look forward to continuing to work with you and your colleagues on this important project. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Wyatt".

URS Corporation

Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110



September 1, 2015

Mr. Douglas McLearen
Attn: Mr. Mark Shaffer
Pennsylvania Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042, PennEast Pipeline Project
Results of Geomorphological Investigations for Proposed Geotechnical Boring in
Delaware Canal State Park, Durham Township, Bucks County, Pennsylvania.

Dear Mr. McLearen:

PennEast Pipeline Company, LLC, (PennEast) plans to drill one four-inch-diameter geotechnical boring within the 400-foot archaeological study corridor in Delaware Canal State Park to evaluate the underlying geology at that location for engineering purposes associated with a proposed horizontal directional drill beneath the Delaware River. The proposed bore is located adjacent to the Delaware Division of the Pennsylvania Canal (Figure 1), which is a National Historic Landmark and is listed in the National Register of Historic Places. Based on the significance of this resource, PennEast's cultural resources consultant (Andrew Wyatt, URS) examined the proposed bore location with PennEast's Geotechnical Engineer, Vatel Shah, Ph.D. (Hatch, Mott, McDonald), and Geomorphologist Frank Vento, Ph.D. on August 28, 2015.

The geotechnical boring will be located approximately 10 feet east of the canal's towpath in a flat area that is in grass with no tree cover. The boring device to be used is tire-mounted and will access the boring location via the existing bridge and towpath. No clearance of vegetation will be necessary for the bore. The bore hole will be approximately four inches in diameter and will be backfilled after the boring is complete. The grass plug will be replaced so that there will be no visual impacts and no slip, trip, or fall hazards.

As part of Dr. Vento's geomorphological investigation, the bore location was identified with a hand-held Global Positioning System device. A shovel test pit (STP) was excavated at the proposed bore location to begin a four-inch bucket auger probe; however, the STP was terminated at approximately one foot below surface in a dense cobble and pebble fill that began immediately under the root mat. No auger probe was possible due to the density of cobbles. Examination of the slope below and to the east of the proposed bore location revealed that this fill extended to depth of at least 20 feet below the proposed boring location and overlaid a T0 terrace composed of recent sands. The cobble and pebble fill was likely used to protect the towpath from flood-induced erosion. The fill was either placed when the canal was constructed or at some point during its operation.

As a result of this investigation, it is URS's opinion that no archaeological investigation is necessary prior to the geotechnical bore at this location. The area adjacent to the towpath is composed of a homogenous, dense cobble and pebble fill that lies on a recent T0 terrace with no archaeological potential. We respectfully request your concurrence that no archaeological investigations are necessary prior to the geotechnical bore. A detailed report of Dr. Vento's geomorphological investigations for the project will be provided for your review with the Phase I archaeological survey report for the PennEast Pipeline Project.

Fedex Tracking #: 774415938816



As timing for the bore is very important to the project schedule, we would sincerely appreciate your concurrence at your earliest convenience. We look forward to continuing to work with you and your colleagues on this important project. Please contact me if you have any questions.

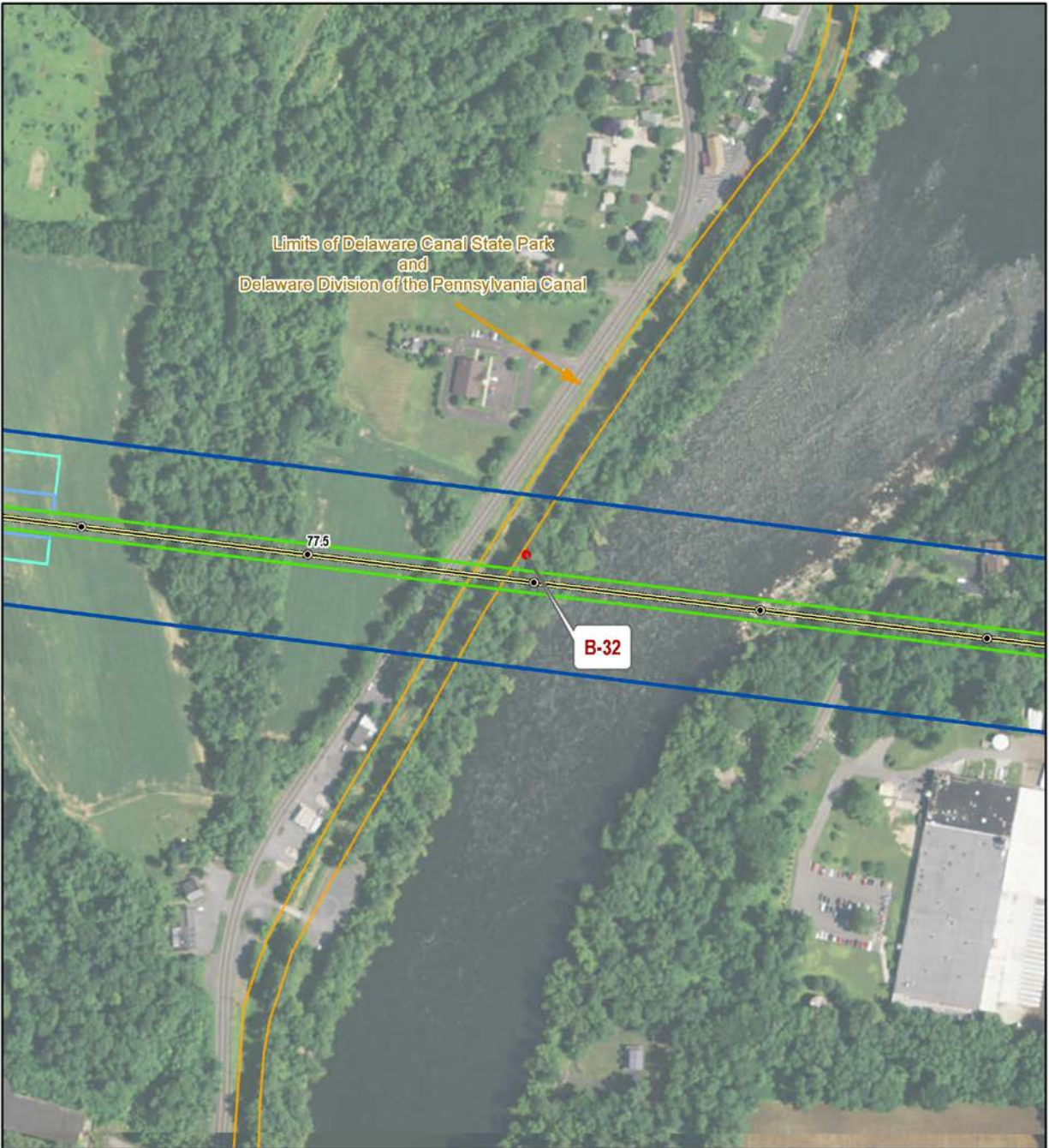
Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Wyatt", is written over a light gray rectangular background.

URS Corporation

Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)

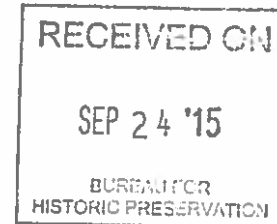


<p>PennEast Pipeline County: <i>Bucks</i> Township: <i>Durham</i> USGS Quad: <i>Riegelsville</i></p>	<table border="0"> <tr> <td>Pipeline</td> <td>Testing Locations</td> </tr> <tr> <td>● Milepost</td> <td>● Proposed Geotechnical Boring Location B-32</td> </tr> <tr> <td>— Centerline</td> <td></td> </tr> <tr> <td>■ Study Corridor (400 ft.)</td> <td></td> </tr> <tr> <td>■ Permanent Workspace</td> <td></td> </tr> <tr> <td>■ TWS</td> <td></td> </tr> <tr> <td>■ ATWS</td> <td></td> </tr> </table>	Pipeline	Testing Locations	● Milepost	● Proposed Geotechnical Boring Location B-32	— Centerline		■ Study Corridor (400 ft.)		■ Permanent Workspace		■ TWS		■ ATWS		<table border="0"> <tr> <td>0 30 60 m</td> <td rowspan="2">N ↑</td> </tr> <tr> <td>0 100 200 ft.</td> </tr> </table> <p><i>Privileged and Confidential</i></p>	0 30 60 m	N ↑	0 100 200 ft.
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September 24, 2015

Mr. Douglas McLearen
Attn: Mr. Mark Shaffer
Pennsylvania Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093



Re: ER# 2014-1767-042
Phase I Archaeological Survey Report and Unanticipated Discovery Plan, PennEast Pipeline Project, Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, (PennEast) URS is submitting a Phase I Archaeological Survey Report for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). The report details archaeological survey conducted in 2014 and 2015 on the preferred alignment. The Phase I survey identified 18 archaeological sites and five isolated finds in a 400-foot-wide study corridor centered on the proposed Project centerline. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, and proposed treatments for each of these resources are contained in the report and are summarized below.

Archaeological Resources in the Area of Potential Effects

Phase I survey identified eight archaeological sites and four isolated finds in the area of potential effects (APE). Five of these archaeological sites and the four isolated finds (36LU050, 36NM0324, 36NM0337, 36NM0338, 36NM0339, 36NM0342, 36NM/168, 36NM/169, and 36BU/103) are recommended as not eligible for listing on the NRHP; therefore, no further investigation or avoidance measures are recommended for these resources.

One site (36NM0330) is a portion of a larger archaeological site located adjacent to the APE. URS recommends that the portion of this site within the APE is not likely to contribute to the NRHP eligibility of the portion of the larger site and that no further investigation of the portion of the site within the APE is needed. The portion of 36NM0330 lying adjacent to the APE is recommended to be potentially NRHP eligible. In order to prevent unintentional damage to the potentially NRHP eligible portion of this site during Project construction, an avoidance plan was prepared and is included in Appendix C of the report.

Two sites (36CR0149, 36NM0328) are recommended as potentially eligible for listing on the NRHP. Based on current Project design, these sites will be affected by the Project; therefore PennEast will perform Phase II evaluations on these two sites to determine their NRHP eligibility.

Archaeological Resources Adjacent to the APE

Six archaeological sites and one isolated find were identified outside of but adjacent to the APE. URS recommends that one of these sites (36LU0330) and the isolated find (36NM/170) are not eligible for listing on the NRHP; therefore no further investigation or avoidance measures are recommended for these resources.



URS recommends that five of the archaeological sites (CEMLU0008, 36NM0336, 36NM0327, 36NM0343, and 36NM0329) are potentially eligible for listing on the NRHP. In order to prevent unintentional damage to these sites during Project construction, an avoidance plan was prepared and is included in Appendix C of the report.

Other Identified Archaeological Resources

Four archaeological sites (36CR0150, 36NM0331, 36NM0340, and 36NM0341) were identified in the study corridor for the preferred alignment or in study corridors for reroutes no longer under consideration and are recommended as potentially eligible for listing on the NRHP. These sites are located at sufficient distances from the APE such that no further investigation or avoidance measures are recommended provided that the APE limits do not change.

Also enclosed for your review is the Project's Unanticipated Discovery Plan (UDP), which has been revised to reflect FERC's comments.

I look forward to receiving your comments on the report and the UDP, but in the meantime should you have any questions please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com.

Sincerely,

URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)



Unanticipated Discovery Plan for the PennEast Pipeline Project

In order to assist the Federal Energy Regulatory Commission (FERC) in meeting the requirements of Section 106 of the National Historic Preservation Act as defined in the Advisory Council On Historic Preservation (Council) regulations “Protection of Historic Properties” (36 CFR 800), URS, on behalf of PennEast Pipeline Company, LLC (PennEast) has developed the following Unanticipated Discovery Plan to be implemented should new or additional cultural resources be found after construction has begun on the proposed project (undertaking). This plan has been developed through reference to the regulations embodied in “Protection of Historic Properties”, issued by the Council and revised in August 2004 (www.achp.gov/regs-rev04.pdf).

URS consulted Pennsylvania legislation that covers treatment of burials and cemeteries (P.L. 730, No. 110; P.L. 141, No. 22). Aside from state laws, additional guidance is provided in Appendix C of the Pennsylvania Historical and Museum Commission’s (PHMC) November 2008 Revised “Guidelines for Archaeological Investigations in Pennsylvania.” Appendix C (PHMC Appendix C, hereafter), entitled “Policy on the Treatment of Human Remains”, was used in the development of this plan.

Termed “unanticipated discovery” or “post-review discovery”, the identification of new or additional cultural resources during implementation of an undertaking typically occurs in the case of projects that involve excavation or ground-disturbing activities (PHMC Appendix C:92). The plan here will be implemented by PennEast if previously undiscovered archaeological resources and/or human remains are identified during construction of the undertaking.

The following steps will be implemented should an unanticipated discovery be made by a PennEast inspector, a contractor, or a subcontractor during the proposed undertaking:

- 1) Construction activities within the immediate area of the unanticipated discovery will be halted (“immediate area” is a context-specific measure, however roughly 30 to 50 feet is generally adequate, although special attention should be given to the possible extension of a new find beyond this buffer zone), and the discovery protected from further disturbance.
- 2) PennEast will notify their cultural resource consultant (URS), who will notify by telephone the FERC and the PHMC. If human remains are identified, the applicable County Coroner and Sheriff will be notified. These notifications will be made within 24 hours of an unanticipated discovery.
- 3) Specific FERC and PHMC instructions concerning an unanticipated discovery resulting from the notification as described above will be followed, although at a minimum sufficient archaeological work will be performed on the unanticipated discovery location to stabilize deposits, protect deposits from scavengers and looters, and to collect readily available samples (e.g. radiocarbon samples) which may help pinpoint the age of deposits.



4) PennEast and URS will consult with the FERC and the PHMC to follow through on a course of action. This may involve further archaeological study or consultation with Native American groups or other parties with established cultural affiliation (PHMC Appendix C:92-93). Construction activities will remain halted until the FERC and the PHMC indicates to PennEast that it may proceed in the area of a specific unanticipated discovery.

In the case of an unanticipated discovery of human remains, PennEast proposes to follow all relevant state and federal law, and recommendations regarding treatment of human remains as referenced above (e.g. PHMC Appendix C). PennEast recognizes the importance of providing careful and respectful treatment for human remains recovered as an unanticipated discovery or as part of an archaeological investigation. In the event of an unanticipated discovery of human remains, PennEast will refer to the FERC and the PHMC as to the appropriate Native American groups with which to consult. Lastly, in coordination with the PHMC and other interested parties, a decision will be made for the treatment of remains (i.e. reburial, preservation in place, scientific study, sacred rituals, or a combination thereof).



Contact List: Unanticipated Discovery Plan for the PennEast Pipeline Project

FERC Contact

Eric Howard
Archaeologist
Office Phone: (202) 502-6263
eric.howard@ferc.gov

Medha Kochhar
Project Manager
Office Phone: (202) 502-8964
medha.kochhar@ferc.gov

PennEast Project Manager

Jeff England
UGI Energy Services
Office Phone: (610) 373-7999 ext. 222
Cell: (719) 213-8273
jengland@ugies.com

URS Contact

Andrew Wyatt
URS Corporation
4507 North Front Street, Suite 200
Harrisburg, PA 17110
Phone: (717) 635-7842
Fax: (717) 635-7902
Cell: (717) 380-7836
andrew.wyatt@urs.com

PHMC Contact

Douglas McLearn
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
Phone : (717) 772-0925
Fax: (717) 772-0920
dmclearen@pa.gov



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
<http://phmc.info/historicpreservation>

September 25, 2015

URS Corporation
Attn: Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

RE: ER# 2014-1767-042-K
FERC: PennEast Pipeline Project, Results of
Geomorphological Investigations for
Proposed Geotechnical Boring in Delaware
Canal State Park, Durham Township, Bucks
County

Dear Mr. Wyatt:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. Our comments are as follows:

Based on your correspondence of September 1, 2015 with regard to the above referenced geomorphological investigation, we concur that no archaeological investigations are necessary prior to the placement of the geotechnical bore

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

A handwritten signature in black ink, appearing to read "D. McLearn".

Douglas C. McLearn, Chief
Division of Archaeology and Protection





October 1, 2015

Mr. Douglas McLearen
Pennsylvania Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042, Updated PennEast Pipeline Alignment
PennEast Pipeline Company, LLC – PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Spectra Energy Partners; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. PennEast filed Draft Resource Reports with FERC in April 2015. Since the Preliminary Draft Resource Report filing in April 2015, PennEast has continued to evaluate potential alternatives to the proposed pipeline alignment based on comments received during the formal Scoping process, ongoing dialogue with federal, state, regional and local agencies, land owners, and the findings from field surveys and engineering analyses.

As noted in our July 24, 2015 update, the overall alignment has been adjusted within the 400 foot survey corridor to avoid and/or minimize impacts to wetlands and waterbodies, cultural resources, agricultural lands and other sensitive habitats. Since that time there have been adjustments to the Project due to the finalization of valve locations.



We look forward to continuing to work with you and your colleagues on this important Project. Please contact me if you have any questions.

On behalf of Jeff England, PennEast Project Manager

Sincerely,

A handwritten signature in black ink that reads "Bernie Holcomb".

Bernie Holcomb

Pipeline Environmental Services Manager



URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
<http://phmc.info/historicpreservation>

October 22, 2015

URS Corporation
Attn: Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

RE: ER# 2014-1767-042-M
FERC: Phase I Archaeological Survey Report
PennEast Pipeline Project. Luzerne, Carbon,
Northampton and Bucks Counties

Dear Mr. Wyatt:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. Our comments are as follows:

Archaeological Sites within the APE

We agree with the recommendation that Phase II archaeological investigations are necessary to assess the eligibility of Sites 36CR0149 and 36NM0328 for listing in the National Register of Historic Places.

We agree with the recommendations that the following sites are not eligible for listing in the National Register of Historic Places and that no further investigation or avoidance is necessary for these sites:

36 NM0324; 36NM0337; 36 NM0338; 36NM0339; 36NM0342.

We agree with the recommendation that the portion of Site 36NM0330 located within the APE does not contribute to the potential eligibility of the greater portion of this site located adjacent to the APE. We also agree with the proposed avoidance plan for the greater portion of this site.

We agree with the recommendation that no further investigation or avoidance is necessary for the following isolated finds, which we agree are not eligible for listing in the National Register of Historic Places:

36LU/050; 36NM/168; 36NM/169; 36BU/103

Archaeological Sites Adjacent to the APE

We agree with the recommendations that Site 36LU0330 is not eligible for listing in the National Register of Historic Places and that no further investigation or avoidance is necessary for this site.



We agree with the proposed avoidance plans for the following sites:

36NM 0327; 36NM0329; 36NM0336; 36NM0343

We also agree with the proposed avoidance plan for the historic cemetery, CEMLU0008, but as an added safeguard, in our opinion, a qualified archaeologist should be on site to monitor all project-related ground disturbing activity in the vicinity of the cemetery, as it is not uncommon for unmarked burials to be located around the perimeter of areas marked by grave stones.

We agree with the recommendation that no further investigation or avoidance is necessary for isolated find 36NM/170, which we agree is not eligible for listing in the National Register of Historic Places.

Other Identified Archaeological Sites

We agree with the recommendation that no further investigation or avoidance is necessary for the following sites provided that the current limits of the APE do not change:

36CR0150; 36NM0331; 36NM0340; 36NM0341.

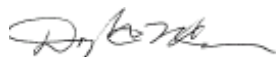
If the limits of the APE change such that any of the aforementioned resources is impacted by project activities, please continue consultation with our office.

We also concur with the proposed Unanticipated Discovery Plan for this project.

On an editorial note, we suggest you correct the typographical error on Page E-5 of Appendix C, in which the discussion of Site 36NM0330 in Williams Township, Northampton County references Site 36NM0329. You should also correct Figure 5.288, the site plan for Site 36NM0342 to reflect the fact that two concrete pads rather than two privies are located within the boundaries of this site. Please provide the corrected pages and we will incorporate them into the hard copy of the report you submitted. Also, please provide three electronic versions of all volumes of this report on three separate CDs for our files and for distribution to the other report repositories. We appreciate your cooperation.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection





Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
<http://phmc.info/historicpreservation>

November 4, 2015

URS Corporation
Attn: Bernie Holcomb, Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

RE: ER# 2014-1767-042-O
FERC: PennEast Pipeline Project, Updated
Pipeline Alignment, Luzerne, Carbon,
Northampton and Bucks Counties

Dear Mr. Holcomb:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

We are in receipt of your correspondence dated October 1, 2015. Our most recent comments concerning above ground cultural resources may be found in our correspondence of October 21, 2015 to Ms. Vanessa Zeoli of your organization. Our most recent comments concerning archaeological resources may be found in our correspondence of October 22, 2015 to Mr. Andrew Wyatt of your organization.

If you have any questions or comments concerning our review for above ground resources, please contact Emma Diehl at (717) 787-9121. If you have any questions or comments concerning our review for archaeological resources, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection





December 17, 2015

Mr. Douglas McLearen
Pennsylvania Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042, Updated PennEast Pipeline Alignment
PennEast Pipeline Company, LLC – PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company (PennEast), thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company; PSEG Power; SJI Midstream; Spectra Energy Partners; and UGI Energy Services.

As an interstate natural gas pipeline, PennEast Pipeline will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. PennEast filed Certificates of Public Convenience and Necessity and Related Authorizations with FERC on September 24, 2015. Since the September 24 filing, PennEast has evaluated several additional route alternatives based on discussions with landowners, regulatory agencies and other stakeholders, as well as comments filed in this proceeding. In light of those evaluations, PennEast has adopted five minor deviations from the route proposed in the September 24 Filing:

- Deviation No. 1005 is located between mileposts (“MP”) 9.07 and 12.10 in Luzerne County, Pennsylvania. PennEast adopted this deviation to address landowner concerns and to improve constructability of the proposed Project route. The landowner and quarry operators affected by this portion of the proposed Project route indicated that the proposed route in the September 24 Filing has the potential to adversely affect quarry operations. Additionally, this portion of the route in the September 24 Filing route presented a challenging crossing of Mill Creek. Deviation No. 1005 addresses both of these concerns. In addition, this deviation reduces the overall length of the Project and increases the route’s co-location with existing utility easements.
- Deviation No. 1400 is located between MP 43.95 and 44.55 in Carbon County, Pennsylvania. This deviation has been adopted based on feedback that PennEast received in collaboration with



the Bethlehem Authority, which operates a water supply system in Carbon and Northampton Counties, Pennsylvania. Deviation No. 1400 provides a means of crossing the Bethlehem Authority waterline by a trenchless method and avoids the need to locate temporary workspace near the waterline. This deviation also includes a single HDD crossing of Beltzville Lake, instead of the two crossings that were proposed in the September 24 Filing, which minimizes impacts to the Beltzville State Park.

- Deviation No. 1701 is located between MP 79.10 and 81.60 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route and is based on feedback that PennEast received in collaboration with the New Jersey Department of Environmental Protection. Deviation No. 1701 minimizes impacts to the New Jersey Natural Lands Trust's Gravel Hill Preserve by increasing co-location with existing utility easements and impacting fewer parcels within the Gravel Hill Preserve. In addition, this deviation allows the proposed route to be in closer proximity to the proposed NRG REMA, LLC/Elizabethtown Gas delivery meter station, and it also relocates a proposed mainline valve from a residential area to an industrial area.
- Deviation No. 1802 is located between MP 84.68 and 86.54 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route to avoid crossing a federally preserved farm. PennEast considered different alternatives to avoid this crossing, and the adopted Deviation No. 1802 minimizes land use impacts and overall land requirements to avoid this crossing.
- Deviation No. 1900 is located between MP 91.91 and 93.55 in Hunterdon County, New Jersey. This deviation has been adopted to incorporate a route optimization that avoids crossing the Lockatong Creek three times with an open cut. This deviation now allows the Project route to cross the Lockatong Creek using a trenchless method. Deviation No. 1900 also avoids impacts to both a federally preserved farm and a New Jersey Green Acres Program protected parcel.

USGS 7.5 minute quadrangle maps with the project area are enclosed to facilitate your review. We look forward to continuing to work with you and your colleagues on this important Project. Please contact me if you have any questions.

On behalf of Jeff England, PennEast Project Manager

Sincerely,

Bernie Holcomb

Pipeline Environmental Services Manager



URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428

Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

March 23, 2016

Mr. Andrew Wyatt, Senior Archaeologist
URS Corporation
4507 North Front Street, Suite 200
Harrisburg, PA 17110

RE: ER 2014-1767-042-S

FERC: PennEast Pipeline Project, Proposed Kidder Compressor Station, Kidder Township,
Carbon County

Dear Mr. Wyatt:

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

Based on our survey files, which include both archaeological sites and standing structures, and the information you provided, it is our opinion that this project has no potential to affect historic properties. Therefore, your responsibility for consultation with the Pennsylvania State Historic Preservation Office (PA SHPO) for this project is complete. Should you become aware, from any source, that historic or archaeological properties are located at or near the project site, please notify us at (717) 783-8947.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. McLearn', is positioned above the typed name.

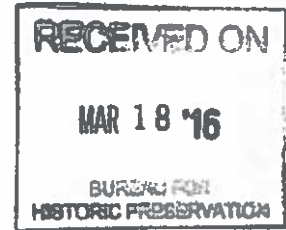
Douglas C. McLearn, Chief
Division of Archaeology and Protection

DEP, Northeast Region



March 18, 2016

Mr. Douglas McLearen
Attn: Mr. Mark Shaffer
Pennsylvania Historical & Museum Commission
Pennsylvania State Historic Preservation Office
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093



Re: ER# 2014-1767-042
Phase I Archaeological Survey Report, PennEast Pipeline Project, Luzerne, Carbon,
Northampton, and Bucks Counties, Pennsylvania. Addendum 1

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, (PennEast) URS is submitting an addendum to the Phase I Archaeological Survey Report for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). This addendum details archaeological survey conducted between July 2015 and February 2016 on the preferred alignment and associated facilities. The Phase I survey identified eight archaeological resources within or adjacent to the area of potential effects (APE) for the preferred alignment. The addendum also includes the results of Phase I survey on areas that are no longer included on the preferred alignment. Phase I survey in these areas identified 12 archaeological resources. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, and proposed treatments for each of these resources are contained in the report.

Appendix D contains proposed Phase II workplans for the NRHP evaluation of sites 36CR0149 and 36NM328. These sites were documented in the initial Phase I report for the Project, which was reviewed by your office under ER# 2014-1767-042-M.

I look forward to receiving your comments on the report and the Phase II workplans, but in the meantime should you have any questions please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com.

Sincerely,

URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

April 11, 2016

Mr. Andrew Wyatt
AECOM
4507 Front Street, Suite 200
Harrisburg, PA 17110

RE: ER 2014-1767-042-U
FERC Docket No. CP15-558-000
PennEast Pipeline Project, Proposed Change in Archaeological Testing Methodology,
T2 Terrace, Susquehanna River, Luzerne County

Dear Mr. Wyatt:

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. Our comments are as follows:

Based on your transmittal of March 14, 2016 to our office, we concur with the proposed change in archaeological survey methodology on the T2 terrace of the Susquehanna River in Luzerne County.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900 or MShaffer@pa.gov.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

April 14, 2016

Mr. Andrew Wyatt, Senior Archaeologist
URS Corporation
4507 North Front Street, Suite 200
Harrisburg, PA 17110

ER 2014-1767-042-T
FERC Docket No. CP15-558-000
Phase I Archaeological Survey Report, Addendum 1, PennEast Pipeline Project, Luzerne,
Carbon, Northampton and Bucks Counties

Dear Mr. Wyatt:

Thank you for submitting this report for the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. Our comments are as follows:

Archaeological Sites within the APE

We agree with the recommendation that Phase I testing should be completed at Sites 36LU0110 and 36LU0337 once access to these properties is available. The results of this additional Phase I testing should be provided to our office in another Phase I addendum report.

We agree with the recommendation that no further work is needed for the portion of Site 36NM0345 located within the APE. It is our understanding that the portion of this site located adjacent to the APE will be avoided by project impacts by marking the site boundaries adjacent to the APE on construction plans, fencing this area of the site off and monitoring at the time of construction in order to avoid inadvertent impacts to this portion of the site. We concur with this avoidance proposal for this site.

It is our understanding that Site 36NM0346 will be avoided because project impacts in this area will involve horizontal directional drilling at a depth of from 110 to 137 feet beneath the site. Based on this, in our opinion, no further work is necessary for Site 36NM0346.

Based on the results of this investigation, we agree with the recommendation that Site 36Nm0347, the stone springbox, is not eligible for listing in the National Register of Historic Places. In our opinion, no further work is necessary for this site.

We concur with the avoidance plan that is proposed for Site 36BU0454, to include marking the site boundaries on construction plans, covering the portion of the site within the access road limit-of-disturbance with geotextile and fill in order to lessen soil compaction and vehicle rutting in the site area, and fencing the limits of the of the access road prior to

April 7, 2016
Mr. Wyatt
ER 2014-1767-042-T
Page Two

construction in order to avoid inadvertent impacts to the portions of the site located outside of the access road limit-of-disturbance.

Archaeological Sites Adjacent to the APE

We concur with the avoidance plan that is proposed for Site 36LU0338, to include marking the site boundaries on construction plans, fencing the site boundaries off, and monitoring at the time of construction in order to avoid inadvertent impacts to this site.

Based on the results of this investigation, we agree with the recommendation that Site 36LU0339, a very low density lithic scatter, is not eligible for listing in the National Register of Historic Places. In our opinion, no further work is necessary for this site.

Archaeological Sites in Abandoned Alignment Segments

It is our understanding that none of the nine sites identified on pipeline alignment segments that have since been eliminated from consideration will be affected by the current preferred alignment. This pertains to Sites CEMLU009, CEMNM 0001, 36CR0151, 36CR0152, 36NM0325, 36NM0326, 36NM0332, 36NM0344 and 36BU0442. If project plans are amended, such that any of these resources is impacted by project activities, then we agree with the recommendation for Phase II archaeological evaluations in order to assess the eligibility of these resources for listing in the National Register of Historic Places.

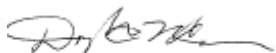
Isolated Finds

We agree with the recommendation that no further work is necessary for the following Isolated Finds:

36CR/003, 36NM/167 and 36NM/171

Please provide three electronic versions of this report (including all figures) on three separate compact disks. We appreciate your cooperation. If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900 or MShafter@pa.gov.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection



August 19, 2016

Mr. Douglas McLearen
Attn: Mr. Mark Shaffer
Pennsylvania Historical & Museum Commission
Pennsylvania State Historic Preservation Office
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042
Phase I Archaeological Survey Report, PennEast Pipeline Project, Luzerne, Carbon,
Northampton, and Bucks Counties, Pennsylvania. Addendum 2

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, (PennEast) URS is submitting the second addendum to the Phase I Archaeological Survey Report for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). This addendum details archaeological survey conducted between February 2016 and June 2016 on the preferred alignment and associated facilities as well as on route deviations that may be incorporated into the preferred alignment at a later date. Phase I survey identified six archaeological sites and one isolated find in the APE for the preferred alignment and in two potential route deviations that may be incorporated into the preferred alignment at a later date. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, avoidance plans, and Phase II workplans are included in the report.

I look forward to receiving your comments on the report, but in the meantime should you have any questions please feel free to contact me at 717.635.7942 or at andrew.wyatt@acem.com.

Sincerely,

URS Corporation

Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

September 22, 2016

URS Corporation
Attn: Andrew Wyatt, M.A.
437 High Street
Burlington, New Jersey 08016

RE: ER 2014-1767-042-X – FERC Docket No. CP15-558-000
Phase I Archaeological Survey Report, Addendum 2, PennEast Pipeline Project, Luzerne,
Carbon, Northampton and Bucks Counties

Dear Mr. Wyatt:

Thank you for providing this report for the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 *et seq.* (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

Sites within the APE

We agree with the recommendation that a Phase II archaeological evaluation is necessary to assess the eligibility of Site 36LU0110 for listing in the National Register of Historic Places. We also agree with the proposed Phase II workplan for this site.

We agree with the recommendation that no further work is necessary for the portion of Site 36LU0337 that is located within the APE.

We agree with the recommendation that a Phase II archaeological evaluation will be necessary to assess the eligibility of Site 36NM0352 for listing in the National Register of Historic Places if Route Deviation P-1505 is incorporated into the preferred alignment.

We agree with the recommendation that no further work is necessary for Isolated Find 36NM/172.

We agree with the recommendation that no further work is necessary for the portion of Site 36NM0349 that is located within the preferred alignment. We also agree with the recommendation that a Phase II archaeological evaluation will be necessary to assess the eligibility of Site 36NM0349 for listing in the National Register of Historic Places if Route Deviation P-1603 is incorporated into the preferred alignment. We agree with the proposed Phase II workplan for this site if a Phase II investigation is necessary.

We agree with the proposed Phase II workplans for Sites 36NM0344 and 36NM0352 if the areas of these sites are incorporated into the preferred alignment.

Page Two
Mr. Wyatt
September 22, 2016

Sites Adjacent to the APE

We agree with the proposed Avoidance and Protection Plan for Sites 36NM0350 and 36NM0351.

Please provide one bound copy of this report (with the corrected pages iii and 83) and three digital versions of this report on three separate compact disks. We appreciate your cooperation in this matter.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900 or MShaffer@pa.gov.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection



September 26, 2016

Mr. Douglas McLearen
Attn: Mr. Mark Shaffer
Pennsylvania Historical & Museum Commission
Pennsylvania State Historic Preservation Office
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042, Updated PennEast Pipeline Alignment
PennEast Pipeline Company, LLC – PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company (PennEast), thank you for your continued collaboration on the proposed PennEast Pipeline Project (Project). As an interstate natural gas pipeline, the Project is under the jurisdictional, multi-year review of the Federal Energy Regulatory Commission (FERC).

PennEast filed its Application for a Certificate of Public Convenience and Necessity and Related Authorizations with FERC September 24, 2015. PennEast filed route modifications with FERC February 22, 2016, and FERC issued a Draft Environmental Impact Statement (EIS) for the Project July 22, 2016. Since the February 22, 2016 route update and issuance of the draft EIS, PennEast has studied an additional 33 minor route deviations to reduce impacts on endangered species and wetlands, increase co-location with existing utilities, and address feedback from collaborative discussions with landowners and regulatory agencies.

On September 23, 2016, PennEast filed with FERC the 33 route modifications and an updated project route, which is provided in the attached USGS-based figures, a Google Earth kmz file and shapefiles for your review. A narrative describing each modification and the explanation for the proposed changes is available on the FERC eLibrary (http://elibrary.ferc.gov/idmws/docket_search.asp) under Docket Number CP15-558-000.

URS's cultural resources team will submit an updated list of all currently identified archaeological sites and historic architectural resources that will be affected by the new alignment in the near future. If you have any questions regarding archaeology, please contact Andrew Wyatt at 717.796.8019 or at andrew.wyatt@aecom.com. If you have any questions regarding historic architecture, please contact Matthew Hamel at 610.832.4538 or at matthew.hamel@aecom.com.

Sincerely,

Bernie Holcomb
Pipeline Environmental Services Manager



URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com

Fedex Tracking # 7773 1712 1759



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

October 11, 2016

URS Corporation
Attn: Bernie Holcomb, Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

RE: ER 2014-1767-042-Y – FERC: Updated PennEast Pipeline Alignment, Luzerne, Carbon, Northampton and Bucks Counties

Dear Mr. Holcomb:

Thank you for providing information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

As per your correspondence dated September 26, 2016 to our office concerning the PennEast Pipeline Project, we look forward to your submittal of an updated list of all currently identified archaeological sites and historic architectural resources that will be affected by the proposed new alignment for this project.

If you have any questions or comments concerning our review for archaeological resources, please contact Mark Shaffer at (717) 783-9900 or MShaffer@pa.gov. If you have any questions or comments concerning our review for above ground resources, please contact Emma Diehl at (717) 787-9121 or Emdiehl@pa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. McLearn', is written above the typed name.

Douglas C. McLearn, Chief
Division of Archaeology and Protection



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

November 9, 2016

URS Corporation
Attn: Andrew Wyatt, Senior Archaeologist
100 Sterling Parkway, Suite 205
Mechanicsburg, PA 17050

RE: ER 2014-1767-042-AA – FERC/COE: PennEast Pipeline Company, LLC – PennEast Pipeline Project, Luzerne, Carbon, Northampton and Bucks Counties

Dear Mr. Wyatt:

Thank you for providing information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 *et seq.* (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

In response to your correspondence of October 31, 2016 for this project, our office is amendable to the development of a Programmatic Agreement if the involved regulatory agencies, the FERC and the U.S. Army Corps of Engineers, feel one is appropriate for this project.

Thank you for providing the updated recommendations for archaeological sites resulting from the route changes in the project design. We look forward to reviewing the avoidance plans for archaeological resources listed in Table 1 of your aforementioned October 31, 2016 correspondence.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900 or MShaffer@pa.gov.

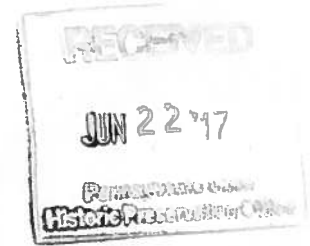
Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection



June 22, 2017

Mr. Douglas McLearen
Pennsylvania Historical & Museum Commission
Pennsylvania State Historic Preservation Office
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093



Re: ER# 2014-1767-042
Phase II Archaeological Evaluation Report: 26NM0328, PennEast Pipeline Project, Northampton County, Pennsylvania.

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, (PennEast) AECOM (formerly URS) is submitting a Phase II archaeological evaluation report for site 36NM0328, located in Upper Nazareth Township, Northampton County, Pennsylvania. As recommended in your letter dated October 22, 2015, AECOM conducted a Phase II archaeological evaluation of Site 36NM0328, Locus 1, 2, and 3 within the area of potential effects for the PennEast Pipeline Project (Project). The evaluation conformed to the Phase II workplan submitted to your office on March 18, 2016 in the report titled *Phase I Archaeological Survey Report, PennEast Pipeline Project, Luzerne, Carbon, and Bucks Counties, Pennsylvania, Addendum 1*.

Phase II evaluation of Locus 1 yielded 1,340 Native American artifacts and two features, one of which contained jasper broadspears in various stages of manufacture, abundant jasper debitage, fire-cracked rock, stone beads, wood charcoal, and charred seeds. AECOM recommends that Locus 1 is likely to provide important information on Transitional Archaic settlement patterns in Watershed 2C and in the Great Valley, and would therefore contribute to the National Register eligibility of the larger site 36NM0328. If Locus 1 cannot be avoided, AECOM recommends that a Phase III archaeological data recovery be conducted prior to Project-related ground disturbance at Locus 1. A data recovery workplan for Locus 1 is included in this report.

Locus 2 and 3 produced 118 and 96 Native American artifacts, respectively, and no features were identified. Based on low artifact counts, low artifact diversity, and lack of features, AECOM recommends that Locus 2 and 3 are unlikely to contribute to the eligibility of site 36NM0328; therefore, no further investigation or avoidance of these loci is recommended.

If you have questions regarding the project, please contact me at (717) 796-8019 or via e-mail at andrew.wyatt@aecom.com.

Yours truly,

AECOM

Andrew Wyatt, M.A.
Senior Archaeologist

AECOM
100 Sterling Parkway, Suite 205
Mechanicsburg, PA 17050
Tel: 717.796.8019
Fax: 717.795.8280

Cc: Jeff England (UGI), Bernard Holcomb (AECOM)



July 20, 2017

Mr. Douglas McLearen
Pennsylvania Historical & Museum Commission
Pennsylvania State Historic Preservation Office
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093



Re: ER# 2014-1767-042
Phase II Archaeological Evaluation Report: 36LU0110, PennEast Pipeline Project, Luzerne County, Pennsylvania.

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC (PennEast), AECOM is submitting a Phase II archaeological evaluation report for site 36LU0110, located in Wyoming Borough, Luzerne County, Pennsylvania. As recommended in your letter dated October 22, 2015, AECOM conducted a Phase II archaeological evaluation of the site within the proposed permanent easement for the PennEast Pipeline Project (Project). The evaluation conformed to the Phase II workplan submitted to your office on August 19, 2016. The Phase II workplan was approved in your letter dated October 22, 2016.

Phase II evaluation identified five Native American components at the site. The first and uppermost of these is a partially plow-truncated, partially buried Late Woodland component that yielded seven pit features, 11 postmolds, and a conventional radiocarbon age of 640 ± 30 BP. Carbonized maize kernel fragments, a tobacco seed, and nutshell were present in features associated with this component. The second component is a sealed early Late Archaic component that is present within a Bv horizon and is represented by a fire-cracked rock feature. Wood charcoal associated with the feature yielded a radiocarbon age of 4470 ± 30 BP. The third component was identified on a levee at depths ranging from 2.37 to 3.07 meters (-7.8 to 10.1 feet) below ground surface. The component yielded abundant debitage, core fragments, and an anvilstone. A radiocarbon date of 6440 ± 40 BP indicates a late Middle Archaic age for the occupation. The fourth component is undated and is marked by a scatter of fire-cracked rock in sealed AB and 2AB horizons. Based on its stratigraphic position, a terminal Late Archaic to Transitional Archaic occupation is inferred. The fifth component is sealed and is tentatively dated to the late Middle Archaic based on stratigraphic position; however, it displays very low artifact density and diversity.

It is AECOM's opinion that the first four components may provide information that addresses regionally important research questions, and they are therefore recommended as contributing to the NRHP-eligibility of the larger site. If the portion of the site in the proposed permanent easement cannot be avoided, AECOM further recommends that a Phase III archaeological data recovery be conducted prior to Project-related ground disturbance. The fifth component is unlikely to contribute to the NRHP eligibility of Site 36LU0110; no further investigation of this component is recommended. A data recovery plan for the portions of the first four components within the proposed permanent easement is provided in the report. Also provided in the report is a treatment plan to minimize effects to portions of the site located outside of the proposed permanent easement but within the Project's area of potential effects.

AECOM looks forward to your review of the report and your comments regarding the site's eligibility, the data recovery workplan, and the treatment plan. If you have questions regarding the project, please contact me at (717) 796-8019 or via e-mail at andrew.wyatt@aecom.com.

Yours truly,

AECOM

Andrew Wyatt, M.A.
Senior Archaeologist

AECOM
100 Sterling Parkway, Suite 205
Mechanicsburg, PA 17050
Tel: 717.796.8019

Cc: Jeff England (UGI), Bernard Holcomb (AECOM)



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

July 21, 2017

AECOM

Attn: Andrew Wyatt, M.A., Senior Archaeologist
100 Sterling Parkway, Suite 205
Mechanicsburg, PA 17050

RE: ER 2014-1767-042-DD – FERC Docket No. CP15-558-000
PennEast Pipeline Project, Phase II Archaeological Evaluation Report, Site 36NM0328,
Upper Nazareth Township, Northampton County

Dear Mr. Wyatt:

Thank you for providing this report for the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 *et seq.* (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

This investigation was well done. In our opinion, the results of the Phase II evaluation of Locus 1 of site 36NM0328 make this site eligible for listing in the National Register of Historic Places under Criterion D. We agree with the recommendation that Phase III archaeological data recovery excavations are warranted within Locus 1 of site 36NM0328 if this portion of the site cannot be avoided by project activities. In the event this portion of the site cannot be avoided by project activities, we agree with the proposed Data Recovery Workplan as presented in this report.

We also agree with the recommendation that Loci 2 and 3 do not contribute to the National Register eligibility of site 36NM0328. In our opinion, no further archaeological work is necessary in these portions of the site.

The proposed Data Recovery Workplan refers to consultation with the consulting parties. The consulting parties should be identified and afforded the opportunity to review and comment on this report. A Memorandum of Agreement should be developed in the event Locus 1 of site 36NM0328 cannot be avoided by project activities. The consulting parties should be invited to review and comment on the Memorandum of Agreement and to be signatories to the agreement. The agreement should include the pertinent stipulations for Phase III data recovery investigations at Locus 1 of 36NM0328.

In our opinion, the agreement should stipulate that the artifacts recovered from site 36NM0328 will be submitted to the State Museum of Pennsylvania for curation.

Please provide two .PDF copies of this report on two separate compact disks. Please include a completed PASS form. The report and the PASS form should be saved as separate .PDF files. Also, include one shape file that includes the project area and the archaeological site area. We appreciate your cooperation in this matter.

Page Two
Mr. Wyatt
July 21, 2017

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900 or MShaffer@pa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "D. McLearn", written in a cursive style.

Douglas C. McLearn, Chief
Division of Archaeology and Protection



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

August 23, 2017

AECOM

Attn: Andrew Wyatt, M.A., Senior Archaeologist
100 Sterling Parkway, Suite 205
Mechanicsburg, PA 17050

RE: 2014-1767-042-EE, FERC Docket No. CP15-558-000 – PennEast Pipeline Project,
Phase II Archaeological Evaluation Report, Site 36LU0110, Wyoming Brough, Luzerne
County

Dear Mr. Wyatt:

Thank you for providing this report for the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

In our opinion, this investigation was well done. We agree with the recommendation that Site 36LU0110 is eligible for listing in the National Register of Historic Places. We also agree with the recommendation that if the portion of the site located within the proposed permanent easement for the project cannot be avoided, Phase III archaeological data recovery is warranted, as proposed in the data recovery plan you provided. We also agree with the treatment plan you have provided to minimize effects to portions of the site located outside of the proposed permanent easement but within the project's area of potential effects.

Please provide one .PDF copy of this report on a compact disk. Also, please provide one shape file that includes the location of the archaeological site area. We appreciate your cooperation in this matter.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection



October 31, 2018

Mr. Douglas McLearn
Pennsylvania Historical & Museum Commission
Pennsylvania State Historic Preservation Office
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042
Phase I Archaeological Survey Report, PennEast Pipeline Project, Luzerne, Carbon, Monroe, and
Northampton Counties, Pennsylvania, Addendum 3

Dear Mr. McLearn:

On behalf of PennEast Pipeline Company, LLC, (PennEast) AECOM is submitting the third addendum to the Phase I Archaeological Survey Report for the PennEast Pipeline Project (Project). As an interstate natural gas pipeline, the Project is regulated by the Federal Energy Regulatory Commission (FERC). This addendum details archaeological survey for the Project that was conducted between June 2016 and July 2018. The archaeological survey was conducted in the area of potential effects (APE) for Project land requirements associated with the September 2016 route that received FERC's Certificate Order on January 19, 2018, as well as survey on additional route and workspace adjustments. The September 2016 route in Pennsylvania (PA) is referred to as the Certificated PA Route. Together, significant portions of the Certificated PA Route, together with preferred reroutes and workspace adjustments constitute what is referred to as the Revised PA Route. PennEast is proceeding with consultations and obtaining environmental permits and approvals for the Revised PA Route. PennEast will submit the Revised PA Route to the FERC in an Amendment Application.

A total of 99.9 percent of the Revised PA Route APE has been surveyed. Approximately 0.1 miles and 1.45 acres of the Revised PA Route APE have not been surveyed due to the lack of landowner permission. Pending right of entry on the remaining unsurveyed parcels, AECOM will report the results to the PA SHPO and FERC in a forthcoming addendum. The Phase I survey reported herein identified seven archaeological sites and three isolated finds that are located in or adjacent to the Revised PA Route, as well as one archaeological site and one isolated find in the Certificated PA Route. Our recommendations on National Register of Historic Places eligibility, the need for further investigations to determine NRHP eligibility, avoidance plans, and Phase II workplans are included in the report.

I look forward to receiving your comments on the report. If you have questions please contact me at (717) 796-8019 or via e-mail at andrew.wyatt@aecom.com.

Yours truly,

AECOM

Andrew Wyatt, M.A.
Senior Archaeologist

AECOM
100 Sterling Parkway, Suite 205
Mechanicsburg, PA 17050
Tel: 717.796.8019
Fax: 717.795.8280

Cc: Amber Holly (UGI), Casey Monagan (UGI), Bernard Holcomb (AECOM), Sarah Binckley (AECOM)



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

November 28, 2018

AECOM

Attn: Andrew Wyatt, M.A., Senior Archaeologist
100 Sterling Parkway, Suite 205
Mechanicsburg, PA 17050

RE: ER 2014-1767-042-II, FERC Docket No. CP15-558-000: PennEast Pipeline Project, Phase I Archaeological Survey Report, Addendum 3, Luzerne, Carbon, Monroe, Northampton and Bucks Counties

Dear Mr. Wyatt:

Thank you for submitting this report for the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

We agree with the recommendation that the following archaeological sites are not eligible for listing in the National Register of Historic Places:

36CR0153, 36NM0221

In our opinion, no further archaeological work is necessary for these sites, and project activities in the areas of these sites will have no effect on significant archaeological resources.

We agree with the recommendation that the portion of site **36NM0076** that is located within the project APE is unlikely to contribute to the National Register eligibility of the larger site. In our opinion, no further archaeological work is necessary for the portion of this site that is located within the project APE, and project activities in the portion of this site located with the project APE will have no effect on significant archaeological resources.

We agree with the recommendation that no further archaeological work is necessary for the following isolated finds:

36CR/004, 36NM177, 36NM174, 36NM176

We concur with the avoidance plans that have been developed for the following archaeological sites:

**36CR0157, 36CR0149, 36CR0151 (portion of site adjacent to Revised PA Route),
36NM0328 (portion of site adjacent to Revised PA Route), 36BU0454**

Page Two
Mr. Wyatt, ER 2014-1767-042-II
November 28, 2018

We concur with the revised avoidance plans that have been developed for the following archaeological sites:

36LU0337, CEM0008, 36NM0345, 36NM0336, 36NM0327, 36NM0329, 36NM0330, 36NM0343
(Appendix A)

We concur with the proposed Phase II workplans that have been developed for the following archaeological sites:

36CR151 (portion of site in the Revised PA Route), 36NM0328 (portion of site in the Revised PA Route).

If you have any questions or comments concerning our review for archaeological resources, please contact Mark Shaffer at mshaffer@pa.gov or (717) 783-9900.

Sincerely,



Douglas C. McLearn, Chief
Division of Environmental Review



December 11, 2018

Mr. Douglas McLearen
Pennsylvania Historical & Museum Commission
Pennsylvania State Historic Preservation Office
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042
Request for Revised PA SHPO Response, Phase I Archaeological Survey Report, PennEast Pipeline Project, Luzerne, Carbon, Monroe, and Northampton Counties, Pennsylvania, Addendum 3

Dear Mr. McLearen:

Thank you for your November 28, 2018 review comments on our Phase I Archaeological Survey Report, Addendum 3 for the PennEast Pipeline Project. In the Abstract and Summary sections of that report, I neglected to add one site (36NM0349) into the list of sites for which the Revised PA Route necessitated revised avoidance plans. An avoidance plan for Site 36NM0349 is in Addendum 3, but because I did not list it in the Abstract or Summary text, you had no indication to include it in your review letter. Copies of the revised Addendum 3 pages that list Site 36NM0349 are included in this transmittal, and electronic copies have been sent to Mark Shaffer and Hannah Harvey of your staff for incorporation into the digital version of Addendum 3.

I respectfully request that you review the avoidance plan for Site 36NM0349 contained in Addendum 3. If you concur with the avoidance plan, I also request that you revise your November 28, 2018 review letter to include your comments on the avoidance plan for this site. If you have questions, please contact me at (717) 796-8019 or via e-mail at andrew.wyatt@aecom.com.

Yours truly,

AECOM

Andrew Wyatt, M.A.
Senior Archaeologist

AECOM
100 Sterling Parkway, Suite 205
Mechanicsburg, PA 17050
Tel: 717.796.8019
Fax: 717.795.8280

Cc: Amber Holly (UGI), Casey Monagan (UGI), Bernard Holcomb (AECOM), Sarah Binckley (AECOM)